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18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**
20 **SAN FRANCISCO DIVISION**

21 ANIBAL RODRIGUEZ, et al. individually and on
22 behalf of all others similarly situated,

23 Plaintiff,

24 vs.

25 GOOGLE LLC,

26 Defendant.

Case No. 3:20-CV-04688-RS

27 **JOINT STIPULATION AND**
28 **[PROPOSED] ORDER ON SCHEDULE**
29 **FOR NOTICE-RELATED DISPUTES**

Judge: Hon. Richard Seeborg
Courtroom: 3, 17th Floor

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Anibal Rodriguez, et al. (“Plaintiffs”)
2 and Defendant Google LLC (“Google”), collectively referred to as the “Parties,” hereby enter into
3 this joint stipulation.

4 WHEREAS, on January 3, 2024, the Court granted Plaintiffs’ Motion for Class Certification
5 (Dkt. 352),

6 WHEREAS, on January 25, 2024, both Parties proposed a February 29, 2024 deadline to
7 file the proposed notice plan with the Court (Dkt. 363),

8 WHEREAS, on February 1, 2024, the Court accepted the Parties’ proposal and set a
9 February 29, 2024 deadline to file the proposed notice plan (Dkt. 367),

10 WHEREAS, the Parties have met and conferred frequently to collaborate on a proposed
11 notice plan,

12 WHEREAS, the Parties have exchanged several drafts of the proposed notice documents
13 and the media through which the notice will be disseminated,

14 WHEREAS, the Parties have worked with the notice administrator to ensure that the content
15 of the notice documents aligns with best practice,

16 WHEREAS, the Parties have agreed to the content of the notice documents and the media
17 types through which the notice will be disseminated,

18 WHEREAS, the Parties have agreed to follow industry standard best practice efforts in
19 conducting direct notice to Class Members by email,

20 WHEREAS, the Parties have recently discovered two potential disputes relating to the
21 mechanics of disseminating notice,

22 WHEREAS, the Parties are committed to continuing to meet and confer to narrow and
23 hopefully resolve these remaining disputes,

24 WHEREAS, the Parties have already exchanged proposals to allow for expeditious
25 resolution of these potential disputes, and

26 WHEREAS, the Parties would benefit from further time to meet and confer regarding these
27 disputes and, if necessary, to present them to this Court for resolution.

1 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the
2 Parties, that no later than **March 7, 2024**, to the extent any disputes remain, the Parties shall file a
3 joint letter-brief not to exceed five pages stating the Parties' competing positions concerning the
4 aforementioned disputes. If the Parties resolve either or both disputes, the submission shall state the
5 Parties' agreement.

6 A Proposed Order is submitted concurrently herewith.

7 Good cause exists for this slight modification to the schedule to allow the Parties to narrow
8 or resolve the remaining disputes and, if necessary, present them for judicial resolution.

9 IT IS SO STIPULATED.

10
11 DATED: February 29, 2024

WILLKIE FARR & GALLAGHER, LLP

12 By: /s/ Eduardo Santacana
13 Eduardo Santacana (SBN: 281668)

14 *Attorneys for Defendant Google LLC*

15 DATED: February 29, 2022

16 By: /s/ Amanda Bonn
17 Amanda Bonn (SBN. 270891)
Attorneys for Plaintiffs

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1 **FILER'S ATTESTATION**

2 Pursuant to Civil Local Rule 5.1, I attest that all signatories listed, and on whose behalf this
3 filing is submitted, concur in the filing's content and have authorized this filing.

4 DATED: February 29, 2024

5 SUSMAN GODFREY L.L.P.

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8 /s/ *Amanda Bonn*

9 Amanda Bonn

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